

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

In re:	§	Chapter 11
WBH Energy, LP,	§	Case No. 15-10003
WBH Energy Partners LLC	§	Case No. 15-10004
WBH Energy GP, LLC	§	Case No. 15-10005
Debtors.	§	Joint Administration Requested

**DEBTORS' EMERGENCY MOTION PURSUANT TO
RULE 1015 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE
REQUESTING JOINT ADMINISTRATION OF CHAPTER 11 CASES**

WBH Energy, LP, *et al.*, the above-captioned debtors and debtors in possession (together, the “Debtors”), by and through their undersigned proposed attorneys, hereby file this motion (the “Motion”), for an order, pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), granting joint administration of their chapter 11 cases. In support of this Motion, the Debtors respectfully represent as follows:

I. JURISDICTION AND VENUE

1. This Court has jurisdiction over these matters pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue of these chapter 11 cases in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory predicate for the relief requested in this Motion is Bankruptcy Rule 1015(b).

II. BACKGROUND

2. On January 4, 2015 (the "Petition Date"), each of the Debtors filed with the United States Bankruptcy Court for the Western District of Texas, Austin Division (the "Bankruptcy Court"), its respective voluntary petition for relief under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.*, as amended (the "Bankruptcy Code")

commencing these chapter 11 cases. The Debtors continue to operate their businesses and manage their properties as debtors in possession pursuant to Sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed, and no committee has yet been appointed or designated.

3. The Debtors also filed a Notice of Designation as Complex Chapter 11 Bankruptcy Cases.

4. Together, the Debtors operate an oil and gas exploration and production business with a primary focus on the Barnett Combo Play of the Fort Worth Basin. Each of the Debtors is a Texas entity, and is based in Austin, Texas. WBH Energy, LP holds working interests in approximately 1,500 leases throughout the Barnett Combo Play. WBH Energy Partners LLC is the oil and gas operating company responsible for developing the working interests of WBH Energy, LP, among others. WBH Energy GP, LLC owns the general partnership interest in WBH Energy, LP.

5. A full description of the Debtors' business, corporate structure, prepetition indebtedness, and events leading to these chapter 11 cases is set forth in the *Declaration of Joseph S. Warnock in Support of Voluntary Petitions Under Chapter 11 of the United States Code and First Day Motions* (the "First Day Affidavit"), filed concurrently herewith and incorporated by reference.

III. RELIEF REQUESTED

6. Pursuant to Bankruptcy Rule 1015(b), the Debtors seek joint administration of their chapter 11 cases and implementation of the following procedures:

- (a) One docket shall be maintained for the Debtors' cases under the case number assigned to WBH Energy, LP.
- (b) The caption of the cases shall be modified to reflect their joint administration as follows:

In re: §
§
WBH Energy, LP, *et al.* § Case No.: 15-10003
§
§ Chapter 11
§
Debtors. §
§ Jointly Administered

- (c) A notation substantially similar to the following notation shall be entered on the docket for all other Debtors to reflect that each of the Debtors' chapter 11 cases shall be jointly administered under the WBH Energy, LP chapter 11 case:

An order has been entered in this case directing joint administration of this case solely for procedural purposes with the chapter 11 bankruptcy case of WBH Energy, LP, Case No. 15-10003. The docket for WBH Energy, LP should be consulted for all matters affecting this case.

- (d) The Office of the U.S. Trustee shall conduct joint informal meetings with the Debtors, as required, and a joint first meeting of creditors, if required.
- (e) One plan and disclosure statement may be filed for all of these cases; however, substantive consolidation is not being requested at this time.
- (f) Proofs of claim filed by creditors of any Debtor shall reflect the caption and case number of the Debtor to which the claim relates and in whose case such claim is to be filed.
- (g) A separate claims register shall be maintained for each Debtor.
- (h) The Debtors shall be authorized to file the monthly operating reports required by the United States Trustee on a consolidated basis in a format acceptable to the U.S. Trustee.

IV. BASIS FOR RELIEF

7. Bankruptcy Rule 1015(b) authorizes this Court to order the joint administration of the bankruptcy cases of a debtor and its affiliates. WBH Energy, LP is an "affiliate" of each Debtor entity, as such term is defined in § 101(2) of the Bankruptcy Code. Accordingly, the Court is authorized to grant the relief requested in this Motion.

8. The Debtors anticipate that, during the course of these cases, it will be necessary to file numerous motions and applications, as well as other pleadings and documents, seeking relief on behalf of all Debtors. The Debtors respectfully submit that joint administration of their chapter 11 cases is in the best interests of their estates, creditors, and other parties-in-interest and will further the interests of judicial economy and administrative expediency by, among other things, obviating the need to: (i) file duplicate motions, (ii) enter duplicate orders, and (iii) forward unnecessary, duplicate notices and other documents to creditors and other parties-in-interest, which actions would cause the Debtors' estates to incur unnecessary costs and expenses. The Debtors are not aware of any administrative or scheduling orders previously entered in these cases that will require modification.

WHEREFORE, the Debtors respectfully request that the Court enter an order, substantially in the form filed herewith, granting the relief requested in this Motion, and such other and further relief as may be just and proper under the circumstances.

Respectfully Submitted,

BRACEWELL & GIULIANI LLP

By: /s/ William A. (Trey) Wood III

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**PROPOSED COUNSEL FOR THE DEBTORS
AND DEBTORS IN POSSESSION**

CERTIFICATE OF SERVICE

The undersigned certifies that on January 5, 2015, a true and correct copy of this document was served by electronic means as listed on the Court's ECF noticing system and via electronic mail or U.S. Mail or fax upon all parties on the attached Master Service List.

/s/ Jason G. Cohen
Jason G. Cohen